

checked by RT
11/20/15

MEMORANDUM

TO: Mr. Addison Rice
Anderson, Mulholland and Associates

DATE: November 14, 2015

FROM: R. Infante

FILE: 1510223B

RE: Data Validation
Air samples
SDG: 1510223B

SUMMARY

Full validation was performed on the data for several gas samples analyzed for volatile organic compounds (full suite) by method Compendium Method TO-15: Determination Of Volatile Organic Compounds (VOCs) In Air Collected In Specially-Prepared Canisters And Analyzed By Gas Chromatography/Mass Spectrometry (GC/MS), January, 1999. The samples were collected at the Building 6 VI, Bristol Myer Squib, Humacao, PR site on October 18, 2010 and submitted to Eurofins Air Toxics, Inc. of Folsom, California that analyzed and reported the results under delivery groups (SDG) 1510223B.

The sample results were assessed according to USEPA data validation guidance documents in the following order of precedence: Compendium Method TO-15. Determination Of Volatile Organic Compounds (VOCs) In Air Collected In Specially-Prepared Canisters And Analyzed By Gas Chromatography/Mass Spectrometry (GC/MS), January, 1999; Validating Air Samples. Volatile Organic Analysis of Ambient Air in Canisters by Method TO-15, (SOP # HW-31. Revision #4. October, 2006. The QC criteria and data validation actions listed on the data review worksheets are from the primary guidance document, unless otherwise noted.

In general the data is valid as reported and may be used for decision making purposes. The data results are acceptable for use.

SAMPLES

The samples included in the review are listed below

Client Sample ID	Lab. Sample ID	Collected Date	Matrix	Analysis
B8SSV-2101015	1510223B-11A	10/10/2015	Air	VOCs
B8SSV-2D101015	1510223B-12A	10/10/2015	Air	VOCs

REVIEW ELEMENTS

Sample data were reviewed for the following parameters, where applicable to the method

- o Agreement of analysis conducted with chain of custody (COC) form
- o Holding time and sample preservation
- o Gas chromatography/mass spectrometry (GC/MS) tunes
- o Initial and continuing calibrations
- o Method blanks/trip blanks/field blank
- o Canister cleaning certification criteria
- o Surrogate spike recovery
- o Internal standard performance and retention times
- o Field duplicate results
- o Laboratory control sample/laboratory control sample duplicate (LCS/LCSD) results
- o Quantitation limits and sample results

DISCUSSION

Agreement of Analysis Conducted with COC Request

Sample reports corresponded to the analytical request designated on the chain-of-custody form except for the following:

- Sample 1510223B-10A not analyzed.

Holding Times and Sample Preservation

Sample preservation was acceptable.

Samples analyzed within method recommended holding time.

GC/MS Tunes

The frequency and abundance of bromofluorobenzene (BFB) tunes were within the QC acceptance criteria. All samples were analyzed within the tuning criteria associated with the method.

Initial and Continuing Calibrations

VOCs – (Method TO-15)

Initial calibration meets method performance criteria. Ongoing accuracy of the instrument was determined by the analysis of a continuing calibration standard, continuing calibration meet the method performance criteria.

Method Blank/Trip Blank/Field Blank

Target analytes were not detected in laboratory method blanks except for the following:

- Bromomethane concentration 4.5 ppbv; no action taken blank concentration below action level. Bromomethane not detected in samples.

Summa canister met cleaning certification criteria.

No trip/field blank analyzed with this data package.

Surrogate Spike Recovery

The surrogate recoveries as per method TO-15 were within the laboratory QC acceptance limits in all samples analyzed.

Internal Standard Performance

VOCs -

Samples were spiked with the method specified internal standard. Internal standard are performance and retention times met the QC acceptance criteria in all sample analyses and calibration standards.

Laboratory/Field Duplicate Results

Field/laboratory duplicates were analyzed as part of this data set. Target analytes meet the RPD performance criteria of + 25 % for analytes 5 x SQL.

LCS/LCSD Results

LCS/LCSD (blank spike) analyzed by the laboratory associated with this data package; % recoveries and RPD within laboratory and generally acceptable control limits.

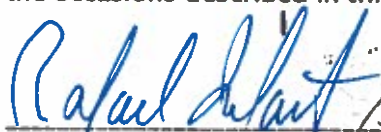
Quantitation Limits and Sample Results

Dilutions were performed on TO-15 samples (see worksheet).

Calculations were spot checked.

Certification

The following samples 1510223B-11A and 1510223B-12A were analyzed following standard procedures accepted by regulatory agencies. The quality control requirements met the methods criteria except in the occasions described in this document. The results are valid.



Rafael Infante
Chemist License 1888



Client Sample ID: B8SSV-2101015

Lab ID#: 1510223B-11A

EPA METHOD TO-15 GC/MS

File Name:	14101541	Date of Collection:	10/10/15 1:15:00 PM
Dil. Factor:	8.10	Date of Analysis:	10/16/15 02:37 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	40	Not Detected	200	Not Detected
Freon 114	40	Not Detected	280	Not Detected
Chloromethane	160	Not Detected	330	Not Detected
Vinyl Chloride	40	35 J	100	89 J
1,3-Butadiene	40	Not Detected	90	Not Detected
Bromomethane	40	Not Detected	160	Not Detected
Chloroethane	160	Not Detected	430	Not Detected
Freon 11	40	Not Detected	230	Not Detected
Ethanol	160	Not Detected	300	Not Detected
Freon 113	40	Not Detected	310	Not Detected
1,1-Dichloroethene	40	Not Detected	160	Not Detected
Acetone	160	Not Detected	380	Not Detected
2-Propanol	160	Not Detected	400	Not Detected
Carbon Disulfide	40	Not Detected	130	Not Detected
3-Chloropropene	160	Not Detected	510	Not Detected
Methylene Chloride	40	11 J	140	38 J
Methyl tert-butyl ether	40	240	150	850
trans-1,2-Dichloroethene	40	Not Detected	160	Not Detected
Hexane	40	850	140	3000
1,1-Dichloroethane	40	Not Detected	160	Not Detected
2-Butanone (Methyl Ethyl Ketone)	160	Not Detected	480	Not Detected
cis-1,2-Dichloroethene	40	14 J	160	58 J
Tetrahydrofuran	40	Not Detected	120	Not Detected
Chloroform	40	Not Detected	200	Not Detected
1,1,1-Trichloroethane	40	Not Detected	220	Not Detected
Cyclohexane	40	1900	140	6700
Carbon Tetrachloride	40	Not Detected	250	Not Detected
2,2,4-Trimethylpentane	40	210	190	960
Benzene	40	20 J	130	64 J
1,2-Dichloroethane	40	Not Detected	160	Not Detected
Heptane	40	2300	160	9400
Trichloroethene	40	Not Detected	220	Not Detected
1,2-Dichloropropane	40	Not Detected	190	Not Detected
1,4-Dioxane	160	Not Detected	580	Not Detected
Bromodichloromethane	40	Not Detected	270	Not Detected
cis-1,3-Dichloropropene	40	Not Detected	180	Not Detected
4-Methyl-2-pentanone	40	Not Detected	160	Not Detected
Toluene	40	Not Detected	150	Not Detected
trans-1,3-Dichloropropene	40	Not Detected	180	Not Detected
1,1,2-Trichloroethane	40	Not Detected	220	Not Detected
Tetrachloroethene	40	Not Detected	270	Not Detected
2-Hexanone	60	Not Detected	660	Not Detected



Client Sample ID: B8SSV-2101015

Lab ID#: 1510223B-11A

EPA METHOD TO-15 GC/MS

File Name:	14101541	Date of Collection:	10/10/15 1:15:00 PM
Dil. Factor:	8.10	Date of Analysis:	10/16/15 02:37 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Dibromochloromethane	40	Not Detected	340	Not Detected
1,2-Dibromoethane (EDB)	40	Not Detected	310	Not Detected
Chlorobenzene	40	Not Detected	190	Not Detected
Ethyl Benzene	40	50	180	220
m,p-Xylene	40	210	180	910
o-Xylene	40	34 J	180	150 J
Styrene	40	Not Detected	170	Not Detected
Bromoform	40	Not Detected	420	Not Detected
Cumene	40	3300	200	16000
1,1,2,2-Tetrachloroethane	40	Not Detected	280	Not Detected
Propylbenzene	40	430	200	2100
4-Ethyltoluene	40	33 J	200	160 J
1,3,5-Trimethylbenzene	40	26 J	200	120 J
1,2,4-Trimethylbenzene	40	18 J	200	87 J
1,3-Dichlorobenzene	40	Not Detected	240	Not Detected
1,4-Dichlorobenzene	40	Not Detected	240	Not Detected
alpha-Chlorotoluene	40	Not Detected	210	Not Detected
1,2-Dichlorobenzene	40	Not Detected	240	Not Detected
1,2,4-Trichlorobenzene	160	Not Detected	1200	Not Detected
Hexachlorobutadiene	160	Not Detected	1700	Not Detected

J = Estimated value.

Container Type: 1 Liter Summa Canister (100% Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	112	70-130
Toluene-d8	106	70-130
4-Bromofluorobenzene	98	70-130



Client Sample ID: B8SSV-2D101015

Lab ID#: 1510223B-12A

EPA METHOD TO-15 GC/MS

File Name:	14101542	Date of Collection:	10/10/15 1:15:00 PM
Dil. Factor:	7.87	Date of Analysis:	10/16/15 03:00 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Freon 12	39	Not Detected	190	Not Detected
Freon 114	39	Not Detected	280	Not Detected
Chloromethane	160	Not Detected	320	Not Detected
Vinyl Chloride	39	38 J	100	98 J
1,3-Butadiene	39	Not Detected	87	Not Detected
Bromomethane	39	Not Detected	150	Not Detected
Chloroethane	160	Not Detected	420	Not Detected
Freon 11	39	Not Detected	220	Not Detected
Ethanol	160	Not Detected	300	Not Detected
Freon 113	39	Not Detected	300	Not Detected
1,1-Dichloroethene	39	Not Detected	160	Not Detected
Acetone	160	Not Detected	370	Not Detected
2-Propanol	160	Not Detected	390	Not Detected
Carbon Disulfide	39	Not Detected	120	Not Detected
3-Chloropropene	160	Not Detected	490	Not Detected
Methylene Chloride	39	12 J	140	43 J
Methyl tert-butyl ether	39	230	140	850
trans-1,2-Dichloroethene	39	Not Detected	160	Not Detected
Hexane	39	840	140	3000
1,1-Dichloroethane	39	Not Detected	160	Not Detected
2-Butanone (Methyl Ethyl Ketone)	160	Not Detected	460	Not Detected
cis-1,2-Dichloroethene	39	14 J	160	55 J
Tetrahydrofuran	39	Not Detected	120	Not Detected
Chloroform	39	Not Detected	190	Not Detected
1,1,1-Trichloroethane	39	Not Detected	210	Not Detected
Cyclohexane	39	2000	140	6800
Carbon Tetrachloride	39	Not Detected	250	Not Detected
2,2,4-Trimethylpentane	39	210	180	970
Benzene	39	19 J	120	62 J
1,2-Dichloroethane	39	Not Detected	160	Not Detected
Heptane	39	2300	160	9600
Trichloroethene	39	Not Detected	210	Not Detected
1,2-Dichloropropane	39	Not Detected	180	Not Detected
1,4-Dioxane	160	Not Detected	570	Not Detected
Bromodichloromethane	39	Not Detected	260	Not Detected
cis-1,3-Dichloropropene	39	Not Detected	180	Not Detected
4-Methyl-2-pentanone	39	Not Detected	160	Not Detected
Toluene	39	Not Detected	150	Not Detected
trans-1,3-Dichloropropene	39	Not Detected	180	Not Detected
1,1,2-Trichloroethane	39	Not Detected	210	Not Detected
Tetrachloroethene	39	Not Detected	270	Not Detected
2-Hexanone	39	Not Detected	640	Not Detected



Client Sample ID: B8SSV-2D101015

Lab ID#: 1510223B-12A

EPA METHOD TO-15 GC/MS

File Name:	14101542	Date of Collection:	10/10/15 1:15:00 PM
Dil. Factor:	7.87	Date of Analysis:	10/16/15 03:00 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Dibromochloromethane	39	Not Detected	340	Not Detected
1,2-Dibromoethane (EDB)	39	Not Detected	300	Not Detected
Chlorobenzene	39	Not Detected	180	Not Detected
Ethyl Benzene	39	54	170	230
m,p-Xylene	39	200	170	870
o-Xylene	39	34 J	170	140 J
Styrene	39	Not Detected	170	Not Detected
Bromoform	39	Not Detected	410	Not Detected
Cumene	39	3300	190	16000
1,1,2,2-Tetrachloroethane	39	Not Detected	270	Not Detected
Propylbenzene	39	430	190	2100
4-Ethyltoluene	39	30 J	190	150 J
1,3,5-Trimethylbenzene	39	21 J	190	100 J
1,2,4-Trimethylbenzene	39	18 J	190	91 J
1,3-Dichlorobenzene	39	Not Detected	240	Not Detected
1,4-Dichlorobenzene	39	Not Detected	240	Not Detected
alpha-Chlorotoluene	39	Not Detected	200	Not Detected
1,2-Dichlorobenzene	39	Not Detected	240	Not Detected
1,2,4-Trichlorobenzene	160	Not Detected	1200	Not Detected
Hexachlorobutadiene	160	Not Detected	1700	Not Detected

J = Estimated value.

Container Type: 1 Liter Summa Canister (100% Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	110	70-130
Toluene-d8	105	70-130
4-Bromofluorobenzene	99	70-130



Sample Transportation Notice

Relinquishing signature on this document indicates that sample is being shipped in compliance with all applicable local, State, Federal, national, and international laws, regulations and ordinances of any kind. Air Toxics Limited assumes no liability with respect to the collection, handling or shipping of these samples. Relinquishing signature also indicates agreement to hold harmless, defend, and indemnify Air Toxics Limited against any claim, demand, or action, of any kind, related to the collection, handling, or shipping of samples. D.O.T. Hotline (800) 467-4922

180 BLUE RAVINE ROAD, SUITE B
FOLSOM, CA 95630-4719
(916) 985-1000 FAX (916) 985-1020

Page 2 of 2

Project Manager Terry Taylor
Collected by: (Print and Sign) Terry Taylor
Company AMAI Email _____
Address _____ City _____ State _____ Zip _____
Phone _____ Fax _____

Project Info:

P.O. # _____
Project # _____
Project Name BMS VI

Turn Around Time:

☐ Normal
☒ Rush
3-day
specify

Lab Use Only

Pressurized by: _____
Date: _____
Pressurization Gas: _____
N₂ He

Lab I.D.	Field Sample I.D. (Location)	Can #	Date of Collection	Time of Collection	Analyses Requested	Canister Pressure/Vacuum			
						Initial	Final	Receipt	Final (psi)
<u>10A</u>	<u>B8SSV-2100915</u>	<u>11427</u>	<u>10/9/15</u>	<u>1623</u>	<u>NO NET ANALYZE</u>	<u>18</u>	<u>3</u>		
<u>11A</u>	<u>B8SSV-2101015</u>	<u>12362</u>	<u>10/10/15</u>	<u>1315</u>	<u>TO-15, CH₄, NAP</u>	<u>30</u>	<u>5.5</u>		
<u>12A</u>	<u>B8SSV-20101015</u>	<u>36541</u>	<u>10/10/15</u>	<u>1315</u>	<u>TO-15, CH₄, NAP</u>	<u>30</u>	<u>5</u>		
<div style="text-align: center; transform: rotate(-45deg);"> <u>AC</u> <u>10-12-15</u> </div>									

Relinquished by: (signature) <u>[Signature]</u>	Date/Time <u>10/12/15 12:00</u>	Received by: (signature) <u>[Signature]</u>	Date/Time <u>10/13/15 0945</u>
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time

Notes:

Shipped via FedEx by AMAI
Tracking no. 774714639650 Box

Lab Use Only	Shipper Name	Air Bill #	Temp (°C)	Condition	Custody Seals Intact?	Work Order #
	<u>FedEx</u>		<u>NR</u>	<u>Good</u>	Yes No <u>None</u>	<u>1510223</u>

DATA REVIEW WORKSHEETS

Project Number: 1510223B
Date: 10/10/2015

REVIEW OF VOLATILE ORGANIC PACKAGE

The following guidelines for evaluating volatile organics were created to delineate required validation actions. This document will assist the reviewer in using professional judgment to make more informed decision and in better serving the needs of the data users. The sample results were assessed according to USEPA data validation guidance documents in the following order of precedence: QC criteria from "Compendium Method TO-15. Determination of Volatile Organic Compounds (VOCs) In Air Collected In Specially-Prepared Canisters and Analyzed By Gas Chromatography/Mass Spectrometry (GC/MS), January, 1999"; USEPA Hazardous Waste Support Branch. Validating Air Samples. Volatile Organic Analysis of Ambient Air in Canisters by Method TO-15, (SOP # HW-31. Revision #4. October, 2006). The QC criteria and data validation actions listed on the data review worksheets are from the primary guidance document, unless otherwise noted.

The hardcopied (laboratory name) Eurofins - Air Toxics data package received has been reviewed and the quality control and performance data summarized. The data review for VOCs included:

Lab. Project/SDG No.: 1510223B Sample matrix: Air
No. of Samples: 2

Trip blank No.: -
Field blank No.: -
Equipment blank No.: -
Field duplicate No.: 1510223B-11A/1510223B-12A

<input checked="" type="checkbox"/> Data Completeness	<input checked="" type="checkbox"/> Laboratory Control Spikes
<input checked="" type="checkbox"/> Holding Times	<input checked="" type="checkbox"/> Field Duplicates
<input checked="" type="checkbox"/> GC/MS Tuning	<input checked="" type="checkbox"/> Calibrations
<input checked="" type="checkbox"/> Internal Standard Performance	<input checked="" type="checkbox"/> Compound Identifications
<input checked="" type="checkbox"/> Blanks	<input checked="" type="checkbox"/> Compound Quantitation
<input checked="" type="checkbox"/> Surrogate Recoveries	<input checked="" type="checkbox"/> Quantitation Limits
<input type="checkbox"/> N/A Matrix Spike/Matrix Spike Duplicate	

Overall Comments: VOCs by method TO-15

Definition of Qualifiers:

J- Estimated results
U- Compound not detected
R- Rejected data
UJ- Estimated nondetect

Reviewer: Rafael Infante
Date: 11/14/2015

DATA REVIEW WORKSHEETS

DATA COMPLETENESS

MISSING INFORMATION

DATE LAB. CONTACTED

DATE RECEIVED

[illegible]

DATA REVIEW WORKSHEETS

All criteria were met X
Criteria were not met
and/or see below _____

HOLDING TIMES

The objective of this parameter is to ascertain the validity of the results based on the holding time of the sample from time of collection to the time of analysis.

Complete table for all samples and note the analysis and/or preservation not within criteria

SAMPLE ID	DATE SAMPLED	DATE ANALYZED	pH	ACTION
All samples analyzed within the recommended method holding time				

Criteria

Aqueous samples – 14 days from sample collection for preserved samples ($\text{pH} \leq 2$, 4°C), no air bubbles.

Aqueous samples – 7 days from sample collection for unpreserved samples, 4°C , no air bubbles.

Soil samples- 7 days from sample collection.

Cooler temperature (Criteria: $4 \pm 2^{\circ}\text{C}$): N/A – summa canisters

Actions

If the VOCs vial(s) have air bubbles, estimate positive results (J) and reject nondetects (R).

If the % solids of soil samples is 10-50%, estimate positive results (J) and nondetects (UJ)

If the % solid of soil samples is $< 10\%$, estimate positive results (J) and reject nondetects (R).

If holding times are exceeded but < 14 days beyond criteria, estimate positive results (J) and nondetects (UJ).

If holding times are exceeded but < 28 days beyond criteria, estimate positive results (J) and reject nondetects (R).

If holding times are grossly exceeded (> 28 days beyond criteria), reject all results (R).

If samples were not iced or if the ice were melted ($> 10^{\circ}\text{C}$), estimate positive results (J) and nondetects (UJ).

DATA REVIEW WORKSHEETS

All criteria were met X
Criteria were not met see below _____

GC/MS TUNING

The assessment of the tuning results is to determine if the sample instrumentation is within the standard tuning QC limits

 X The BFB performance results were reviewed and found to be within the specified criteria.

 X BFB tuning was performed for every 24 hours of sample analysis.

If no, use professional judgment to determine whether the associated data should be accepted, qualified or rejected.

List the samples affected:

If mass calibration is in error, all associated data are rejected.

DATA REVIEW WORKSHEETS

All criteria were met X
 Criteria were not met
 and/or see below

CALIBRATION VERIFICATION

Compliance requirements for satisfactory instrument calibration are established to ensure that the instrument is capable of producing and maintaining acceptable quantitative data.

Date of initial calibration: 09/03/15
 Dates of continuing calibration: 10/15/15
 Instrument ID numbers: MSD-14
 Matrix/Level: Air/low

DATE	LAB ID#	FILE	CRITERIA OUT RFs, %RSD, %D, r	COMPOUND	SAMPLES AFFECTED
Initial and continuing calibration met the method performance criteria.					

Criteria

All RFs must be > 0.05 regardless of method requirements for SPCC.

All %RSD must be $\leq 15\%$ regardless of method requirements for CCC.

All %Ds must be $\leq 30\%$ regardless of method requirements for CCC.

Method TO-15 does not specify criterion for the curve correlation coefficient (r). A limit for r of ≥ 0.995 has therefore been utilized as professional judgment.

Actions

If any compound has an initial RF or a continuing RF of < 0.05 , estimate positive results (J) and reject nondetects (R), regardless of method requirements.

If any compound has a %RSD $> 15\%$, estimate positive results (J) and use professional judgment to qualify nondetects.

If any compound has a %RSD $> 90\%$, estimate positive results (J) and reject nondetects (R).

If any compound has a % D $> 30\%$, estimate positive results (J) and reject nondetects (R).

If any compound has a % D $> 30\%$, estimate positive results (J) and nondetects (UJ).

If any compound has a % D $> 90\%$, estimate positive results (J) and reject nondetects (R).

If any compound has r < 0.995 , estimate positive results and nondetects.

A separate worksheet should be filled for each initial curve

DATA REVIEW WORKSHEETS

All criteria were met _____
 Criteria were not met _____
 and/or see below X

V A. BLANK ANALYSIS RESULTS (Sections 1 & 2)

The assessment of the blank analysis results is to determine the existence and magnitude of contamination problems. The criteria for evaluation of blanks apply only to blanks associated with the samples, including trip, equipment, and laboratory blanks. If problems with any blanks exist, all data associated with the case must be carefully evaluated to determine whether or not there is an inherent variability in the data for the case, or if the problem is an isolated occurrence not affecting other data.

List the contamination in the blanks below. High and low levels blanks must be treated separately.

Laboratory blanks

DATE ANALYZED	LAB ID	LEVEL/ MATRIX	COMPOUND	CONCENTRATION/ UNITS
---------------	--------	---------------	----------	----------------------

 All method/laboratory blank method specific criteria except for the followings:

<u> 10/15/15 </u>	<u> 1510223B-13A </u>	<u> Air/low </u>	<u> Bromomethane </u>	<u> 4.5 ppbv </u>
---------------------	-------------------------	--------------------	-------------------------	---------------------

Note: no action taken; analyte concentrations below the action level for blanks.

 Summa canisters met cleaning certification criteria

Field/Equipment/Trip blank

DATE ANALYZED	LAB ID	LEVEL/ MATRIX	COMPOUND	CONCENTRATION UNITS
---------------	--------	---------------	----------	---------------------

 No field/trip/equipment blanks analyzed with this data package.

DATA REVIEW WORKSHEETS

All criteria were met _____
Criteria were not met _____
and/or see below X

V.B. BLANK ANALYSIS RESULTS (Section 3)

Blank Actions

Action Levels (ALs) should be based upon the highest concentration of contaminant determined in any blank. Do not qualify any blank with another blank. The ALs for samples which have been diluted should be corrected for the sample dilution factor and/or % moisture, where applicable. No positive sample results should be reported unless the concentration of the compound in the samples exceeds the ALs:

ALs = 10x the amount of common contaminants (methylene chloride, acetone, 2-butanone, and toluene)

ALs = 5x for any other compounds

Specific actions are as follows:

If the concentration is < sample quantitation limit (SQL) and \leq AL, report the compound as not detected (U) at the SQL.

If the concentration is \geq SQL but \leq AL, report the compound as not detected (U) at the reported concentration.

If the concentration is \geq SQL and $>$ AL, report the concentration unqualified.

Notes:

High and low level blanks must be treated separately

Compounds qualified "U" for blank contamination are still considered "hits" when qualifying for calibration criteria.

[illegible]

DATA REVIEW WORKSHEETS

All criteria were met X
Criteria were not met
and/or see below

SURROGATE SPIKE RECOVERIES

Laboratory performance of individual samples is established by evaluation of surrogate spike recoveries. All samples are spiked with surrogate compounds prior to sample analysis. The accuracy of the analysis is measured by the surrogate percent recovery. Since the effects of the sample matrix are frequently outside the control of the laboratory and may present relatively unique problems, the validation of data is frequently subjective and demands analytical experience and professional judgment.

List the percent recoveries (%Rs) which do not meet the criteria for surrogate recovery.

Matrix: solid/aqueous

SAMPLE ID	SURROGATE COMPOUND	ACTION
-----------	--------------------	--------

1,2-DICHLOROETHANE- d4	Toluene- d8	4-BFB
---------------------------	----------------	-------

Surrogate recoveries within laboratory control limits

QC Limits* (Air)

LL to UL 70 to 130 70 to 130 70 to 130

- * QC limits are laboratory in-house performance criteria, LL = lower limit, UL = upper limit.
* If QC limits are not available, use limits of 80 – 120 % for aqueous and 70 – 130 % for solid samples.

Actions:

QUALITY	%R < 10%	%R = 10% - LL	%R > UL
Positive results	J	J	J
Nondetects results	R	UJ	Accept

Surrogate action should be applied:

If one or more surrogate in the VOC fraction is out of specification, but has a recovery of > 10%.

If any one surrogate in a fraction shows < 10 % recovery.

DATA REVIEW WORKSHEETS

All criteria were met _____
 Criteria were not met _____
 and/or see below N/A

VII. A MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD)

This data is generated to determine long term precision and accuracy in the analytical method for various matrices. This data alone cannot be used to evaluate the precision and accuracy of individual samples. If any % R in the MS or MSD falls outside the designated range, the reviewer should determine if there are matrix effects, i.e. LCS data are within the QC limits but MS/MSD data are outside QC limit.

1. MS/MSD Recoveries and Precision Criteria

The laboratory should use one MS and a duplicate analysis of an unspiked field sample if target analytes are expected in the sample. If target analytes are not expected, MS/MSD should be analyzed.

List the %Rs, RPD of the compounds which do not meet the criteria.

Sample ID: _____ Matrix/Level: _____

MS OR MSD	COMPOUND	% R	RPD	QC LIMITS	ACTION
MS/MSD are not required as part of Method TO-15; blank spike used to assess accuracy					

- * QC limits are laboratory in-house performance criteria, LL = lower limit, UL = upper limit.
- * If QC limits are not available, use limits of 70 – 130 %.

Actions:

QUALITY	%R < LL	%R > UL
Positive results	J	J
Nondetects results	R	Accept

MS/MSD criteria apply only to the unspiked sample, its dilutions, and the associated MS/MSD samples:

If the % R for the affected compounds were < LL (or 70 %), qualify positive results (J) and nondetects (UJ).

If the % R for the affected compounds were > UL (or 130 %), only qualify positive results (J).

If 25 % or more of all MS/MSD %R were < LL (or 70 %) or if two or more MS/MSD %Rs were < 10%, qualify all positive results (J) and reject nondetects (R).

A separate worksheet should be used for each MS/MSD pair.

DATA REVIEW WORKSHEETS

All criteria were met _____
Criteria were not met _____
and/or see below _____ N/A _____

VII. B MATRIX SPIKE/MATRIX SPIKE DUPLICATE

MS/MSD – Unspiked Compounds

It should be noted that Method TO-15 does not specify a MS/MSD criteria for the unspiked compounds in the sample. A %RSD of < 50% has therefore been utilized as professional judgment.

If all target analytes were spiked in the MS/MSD, this review element is not applicable.

List the %RSD of the compounds which do not meet the criteria.

Sample ID: _____ Matrix/Level/Unit: _____

COMPOUND	SAMPLE CONC.	MS CONC.	MSD CONC.	% RSD	ACTION
----------	-----------------	----------	-----------	-------	--------

1. **Introduction**
 2. **Background**
 3. **Methodology**
 4. **Results**
 5. **Discussion**
 6. **Conclusion**
 7. **References**
 8. **Appendix**
 9. **Figure 1**
 10. **Figure 2**
 11. **Figure 3**
 12. **Figure 4**
 13. **Figure 5**
 14. **Figure 6**
 15. **Figure 7**
 16. **Figure 8**
 17. **Figure 9**
 18. **Figure 10**
 19. **Figure 11**
 20. **Figure 12**
 21. **Figure 13**
 22. **Figure 14**
 23. **Figure 15**
 24. **Figure 16**
 25. **Figure 17**
 26. **Figure 18**
 27. **Figure 19**
 28. **Figure 20**
 29. **Figure 21**
 30. **Figure 22**
 31. **Figure 23**
 32. **Figure 24**
 33. **Figure 25**
 34. **Figure 26**
 35. **Figure 27**
 36. **Figure 28**
 37. **Figure 29**
 38. **Figure 30**
 39. **Figure 31**
 40. **Figure 32**
 41. **Figure 33**
 42. **Figure 34**
 43. **Figure 35**
 44. **Figure 36**
 45. **Figure 37**
 46. **Figure 38**
 47. **Figure 39**
 48. **Figure 40**
 49. **Figure 41**
 50. **Figure 42**
 51. **Figure 43**
 52. **Figure 44**
 53. **Figure 45**
 54. **Figure 46**
 55. **Figure 47**
 56. **Figure 48**
 57. **Figure 49**
 58. **Figure 50**
 59. **Figure 51**
 60. **Figure 52**
 61. **Figure 53**
 62. **Figure 54**
 63. **Figure 55**
 64. **Figure 56**
 65. **Figure 57**
 66. **Figure 58**
 67. **Figure 59**
 68. **Figure 60**
 69. **Figure 61**
 70. **Figure 62**
 71. **Figure 63**
 72. **Figure 64**
 73. **Figure 65**
 74. **Figure 66**
 75. **Figure 67**
 76. **Figure 68**
 77. **Figure 69**
 78. **Figure 70**
 79. **Figure 71**
 80. **Figure 72**
 81. **Figure 73**
 82. **Figure 74**
 83. **Figure 75**
 84. **Figure 76**
 85. **Figure 77**
 86. **Figure 78**
 87. **Figure 79**
 88. **Figure 80**
 89. **Figure 81**
 90. **Figure 82**
 91. **Figure 83**
 92. **Figure 84**
 93. **Figure 85**
 94. **Figure 86**
 95. **Figure 87**
 96. **Figure 88**
 97. **Figure 89**
 98. **Figure 90**
 99. **Figure 91**
 100. **Figure 92**
 101. **Figure 93**
 102. **Figure 94**
 103. **Figure 95**
 104. **Figure 96**
 105. **Figure 97**
 106. **Figure 98**
 107. **Figure 99**
 108. **Figure 100**
 109. **Figure 101**
 110. **Figure 102**
 111. **Figure 103**
 112. **Figure 104**
 113. **Figure 105**
 114. **Figure 106**
 115. **Figure 107**
 116. **Figure 108**
 117. **Figure 109**
 118. **Figure 110**
 119. **Figure 111**
 120. **Figure 112**
 121. **Figure 113**
 122. **Figure 114**
 123. **Figure 115**
 124. **Figure 116**
 125. **Figure 117**
 126. **Figure 118**
 127. **Figure 119**
 128. **Figure 120**
 129. **Figure 121**
 130. **Figure 122**
 131. **Figure 123**
 132. **Figure 124**
 133. **Figure 125**
 134. **Figure 126**
 135. **Figure 127**
 136. **Figure 128**
 137. **Figure 129**
 138. **Figure 130**
 139. **Figure 131**
 140. **Figure 132**
 141. **Figure 133**
 142. **Figure 134**
 143. **Figure 135**
 144. **Figure 136**
 145. **Figure 137**
 146. **Figure 138**
 147. **Figure 139**
 148. **Figure 140**
 149. **Figure 141**
 150. **Figure 142**
 151. **Figure 143**
 152. **Figure 144**
 153. **Figure 145**
 154. **Figure 146**
 155. **Figure 147**
 156. **Figure 148**
 157. **Figure 149**
 158. **Figure 150**
 159. **Figure 151**
 160. **Figure 152**
 161. **Figure 153**
 162. **Figure 154**
 163. **Figure 155**
 164. **Figure 156**
 165. **Figure 157**
 166. **Figure 158**
 167. **Figure 159**
 168. **Figure 160**
 169. **Figure 161**
 170. **Figure 162**
 171. **Figure 163**
 172. **Figure 164**
 173. **Figure 165**
 174. **Figure 166**
 175. **Figure 167**
 176. **Figure 168**
 177. **Figure 169**
 178. **Figure 170**
 179. **Figure 171**
 180. **Figure 172**
 181. **Figure 173**
 182. **Figure 174**
 183. **Figure 175**
 184. **Figure 176**
 185. **Figure 177**
 186. **Figure 178**
 187. **Figure 179**
 188. **Figure 180**
 189. **Figure 181**
 190. **Figure 182**
 191. **Figure 183**
 192. **Figure 184**
 193. **Figure 185**
 194. **Figure 186**
 195. **Figure 187**
 196. **Figure 188**
 197. **Figure 189**
 198. **Figure 190**
 199. **Figure 191**
 200. **Figure 192**
 201. **Figure 193**
 202. **Figure 194**
 203. **Figure 195**
 204. **Figure 196**
 205. **Figure 197**
 206. **Figure 198**
 207. **Figure 199**
 208. **Figure 200**
 209. **Figure 201**
 210. **Figure 202**
 211. **Figure 203**
 212. **Figure 204**
 213. **Figure 205**
 214. **Figure 206**
 215. **Figure 207**
 216. **Figure 208**
 217. **Figure 209**

Actions:

- * If the % RSD > 50, qualify the positive result in the unspiked samples as estimated (J).
* If the % RSD is not calculated (NC) due to nondetected value, use professional judgment to qualify the data.

DATA REVIEW WORKSHEETS

All criteria were met X
 Criteria were not met
 and/or see below

VIII. LABORATORY CONTROL SAMPLE (LCS) ANALYSIS

This data is generated to determine accuracy of the analytical method for various matrices.

1. LCS Recoveries Criteria

Where LCS spiked with the same analyte at the same concentrations as the MS/MSD?
 Yes or No. If no make note in data review memo.

List the %R of compounds which do not meet the criteria

LCS ID	COMPOUND	% R	QC LIMIT
LCS/LCSD_% recoveries_and_RPD_within_laboratory_control_limits. _____			

- * QC limits are laboratory in-house performance criteria, LL = lower limit, UL = upper limit.
- * If QC limits are not available, use limits of 70 – 130 %.

Actions:

QUALITY	%R < LL	%R > UL
Positive results	J	J
Nondetects results	R	Accept

All analytes in the associated sample results are qualified for the following criteria.

If 25 % of the LCS recoveries were < LL (or 70 %), qualify all positive results (j) and reject nondetects (R).

If two or more LCS were below 10 %, qualify all positive results as (J) and reject nondetects (R).

2. Frequency Criteria:

Where LCS analyzed at the required frequency and for each matrix? Yes or No.

If no, the data may be affected. Use professional judgment to determine the severity of the effect and qualify data accordingly. Discuss any actions below and list the samples affected.

DATA REVIEW WORKSHEETS

All criteria were met X
 Criteria were not met
 and/or see below

IX. LABORATORY DUPLICATE PRECISION

Sample IDs: LCS/LCSD

Matrix: Air

Laboratory duplicate samples may be taken and analyzed as an indication of overall precision. These analyses measure both field and lab precision; therefore, the results may have more variability than laboratory duplicates which only laboratory performance. It is also expected that soil duplicate results will have a greater variance than water matrices due to difficulties associated with collecting identical field duplicate samples.

The project QAPP should be reviewed for project-specific information.

Suggested criteria: RPD \pm 25% for air samples. If both samples and duplicate are <5 SQL, the RPD criteria is doubled.

COMPOUND	SQL	SAMPLE CONC.	DUPLICATE CONC.	RPD	ACTION
RPD within laboratory and generally acceptable control limits.					

Actions:

Qualify as estimated positive results (J) and nondetects (UJ) for the compound that exceeded the above criteria. For organics, only the sample and duplicate will be qualified.

If an RPD cannot be calculated because one or both of the sample results is not detected, the following actions apply:

If one sample result is not detected and the other is greater than 5x the SQL qualify (J/UJ).

If one sample value is not detected and the other is greater than 5x the SQL and the SQLs for the sample and duplicate are significantly different, use professional judgment to determine if qualification is appropriate.

If one sample value is not detected and the other is less than 5x, use professional judgment to determine if qualification is appropriate.

If both sample and duplicate results are not detected, no action is needed.

DATA REVIEW WORKSHEETS

All criteria were met _____
 Criteria were not met _____
 and/or see below X

IX. FIELD DUPLICATE PRECISION

Sample IDs: 1510223B-11A/1510223B-12A

Matrix: Air

Field duplicates samples may be taken and analyzed as an indication of overall precision. These analyses measure both field and lab precision; therefore, the results may have more variability than laboratory duplicates which only laboratory performance. It is also expected that soil duplicate results will have a greater variance than water matrices due to difficulties associated with collecting identical field duplicate samples.

The project QAPP should be reviewed for project-specific information.

Suggested criteria: RPD \pm 25% for air samples. If both samples and duplicate are <5 SQL, the RPD criteria is doubled.

COMPOUND	SQL	SAMPLE CONC.	DUPLICATE CONC.	RPD	ACTION
RPD within laboratory and generally acceptable control limits.					

Actions:

Qualify as estimated positive results (J) and nondetects (UJ) for the compound that exceeded the above criteria. For organics, only the sample and duplicate will be qualified.

If an RPD cannot be calculated because one or both of the sample results is not detected, the following actions apply:

If one sample result is not detected and the other is greater than 5x the SQL qualify (J/UJ).

If one sample value is not detected and the other is greater than 5x the SQL and the SQLs for the sample and duplicate are significantly different, use professional judgment to determine if qualification is appropriate.

If one sample value is not detected and the other is less than 5x, use professional judgment to determine if qualification is appropriate.

If both sample and duplicate results are not detected, no action is needed.

DATA REVIEW WORKSHEETS

All criteria were met X
 Criteria were not met
 and/or see below

X. INTERNAL STANDARD PERFORMANCE

The assessment of the internal standard (IS) parameter is used to assist the data reviewer in determining the condition of the analytical instrumentation.

List the internal standard area of samples which do not meet the criteria.

- * Area of +40% or -40% of the IS area in the associated calibration standard.
- * Retention time (RT) within ± 0.06 seconds of the IS area in the associated calibration standard.

DATE	SAMPLE ID	IS OUT	IS AREA	ACCEPTABLE RANGE	ACTION
------	-----------	--------	---------	------------------	--------

Internal standard area and retention times within laboratory control limits for both samples and calibration standards

Actions:

1. IS actions should be applied to the compound quantitated with the out-of-control ISs

QUALITY	IS AREA < -40%	IS AREA > + 40%
Positive results	J	J
Nondetected results	R	ACCEPT

2. If a IS retention time varies more than 0.330 seconds, the chromatographic profile for that sample must be examined to determine if any false positive or negative exists. For shifts of a large magnitude, the reviewer may consider partial or total rejection of the data for the sample fraction.

DATA REVIEW WORKSHEETS

All criteria were met X
Criteria were not met
and/or see below

XII. SAMPLE QUANTITATION

The sample quantitation evaluation is to verify laboratory quantitation results. In the space below, please show a minimum of one sample calculation:

1510223B-11A

Cyclohexane RF = 2.78794

$$[] = (83114)(400)/(49832)(2.78794)$$

$$= 239 \text{ ppbv OK}$$

DATA REVIEW WORKSHEETS

All criteria were met X
 Criteria were not met
 and/or see below

XII. QUANTITATION LIMITS

A. Dilution performed

SAMPLE ID	DILUTION FACTOR	REASONS FOR DILUTION
1510223B-11A	8.10	Sample matrix
1510223B-12A	7.87	Sample matrix

B. Percent Solids

List samples which have ≤ 50 % solids

Actions:

If the % solids of a soil sample is 10-50%, estimate positive results (J) and nondetects (UJ)

If the % solids of a soil sample is < 10%, estimate positive results (J) and reject nondetects (R)